

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ALTA POWER LLC,
Plaintiff/Counter-Defendant,

v.

**GENERAL ELECTRIC
INTERNATIONAL, INC., n/k/a GE
VERNOVA INTERNATIONAL LLC,
d/b/a GE POWER SERVICES,**
Defendant/Counter-Plaintiff.

Case No. 3:23-CV-270-X

**GE VERNOVA INTERNATIONAL LLC'S
OPPOSED EMERGENCY MOTION TO COMPEL DISCOVERY AND
FOR RULE 37 SANCTIONS AND TEMPORARY STAY**

In light of Alta's improper expert disclosures, GE moves on an emergency basis to seek the Court's immediate intervention. GE respectfully requests that the Court (1) temporarily stay the remaining deadlines in this case pending the resolution of this motion; (2) order percipient experts Matthew Laterza and William Mars to comply with their subpoenas and order Alta to produce all of Matthew Laterza's responsive documents that were previously withheld based on privilege; (3) bar Alta expert Quentin Mimms from relying on materials that were altered or late produced in direct violation of this Court's October 10, 2024 discovery order (Dkt. 66) and grant GE additional time to serve responding expert reports; (4) order Alta to pay GE's attorneys' fees for the time that GE's counsel expended in preparing this motion; and (5) grant a status conference and an opportunity to apprise the Court of Alta's deficiencies in person.

Dated: March 7, 2025

Respectfully submitted,

/s/ Andrew LeGrand
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of this filing has been served on counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Andrew LeGrand
Andrew LeGrand

Attorney for GE Vernova International LLC

CERTIFICATE OF CONFERENCE

I certify that on March 6 and 7, 2025, counsel for GE conferred with counsel for Alta regarding the relief requested in this motion. Counsel for Alta indicated that it opposes this motion, except to the extent Alta is open to consenting to an unspecified amount of additional time to respond to the expert report of Quentin Mimms.

/s/ Andrew LeGrand
Andrew LeGrand

Attorney for GE Vernova International LLC